

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

Hon. Robert. B. Kugler

This Document Relates To:
All Actions

Civ. No. 19-2875 (RBK/JS)

**PLAINTIFFS' AMENDED NOTICE OF VIDEOTAPED
DEPOSITION TO DAWN CHITTY**

TO: **Alexis Brancato, Esq.**
Brittney Nagle, Esq.
Kirkland & Ellis, LLP
601 Lexington Avenue,
New York, NY 10022

Counsel for Defendants Torrent Pharmaceuticals LTD and Torrent Pharma Inc.

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30, Plaintiffs will take the videotaped deposition of Dawn Chitty. The deposition will commence on **Thursday May 13, 2021, at 9:00 a.m. Eastern Standard Time**, and continue until completion, at 2700 W C Ave, Kalamazoo, Michigan 49009, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632).

The witness shall produce the documents requested at Exhibit A, attached hereto, at least 5 days in advance of the deposition.

The deposition will be taken upon oral examination before an officer authorized to administer oaths. A translator will not be provided. Testimony given during the deposition will be recorded by sound video recording and stenographic means.

TAKING ATTORNEYS FOR PLAINTIFFS:

Sara Papantonio
Madeline Pendley
Levin Papantonio Rafferty Proctor Buchanan O'Brien Barr Mougey, P.A.
316 South Baylen St.
Pensacola, Florida 32502
850-435-7013
spapantonio@levinlaw.com
mpendley@levinlaw.com

DATED this 25th day of March, 2021.

LAW OFFICES OF GEORGE A. BARTON, P.C.

By: /s/ Stacy A. Burrows
Stacy A. Burrows
7227 Metcalf Ave. Ste. 301
Overland Park, KS 66204
Phone (913) 563-6253

Attorneys for Plaintiffs

EXHIBIT A

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Dawn Chitty.
2. All documents in Dawn Chitty's possession pertaining to Torrent Pharmaceuticals Limited and Torrent Pharma Inc.'s production, sale, and recall of valsartan, losartan, and irbesartan products and any communications in her possession regarding the same.

CERTIFICATE OF SERVICE

I, Stacy Burrows, hereby certify that on March 25th, 2021, I caused true and correct copies of the foregoing to be transmitted via ECF to all counsel having registered an appearance on ECF, with courtesy copies served on counsel for Torrent Pharmaceuticals Limited and Torrent Pharma Inc., and Defendants' liaison counsel, via email.

DATED this 25th day of March, 2021.

LAW OFFICES OF GEORGE A. BARTON, P.C.

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7227 Metcalf Ave. Ste. 301
Overland Park, KS 66204
Phone (913) 563-6253

Attorneys for Plaintiffs